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Ms. Donna Searcy  
Secretary  
Federal Communications Commission  
1919 M Street NW  
Washington D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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MAY 7 1993

FCC MAIL ROOM

Re: ET Docket No. 92-298

Dear Ms. Searcy;

Concerning the proposed rulemaking to make Motorola CQUAM the stereo standard and to ban all others, I believe this rulemaking to be ill advised and ill timed. In the light of the recent demonstration of in band digital audio at the NAB spring show, I believe that it is premature to name a stereo AM standard at this time and with the evidence presently available. Although the digital stereo as demonstrated at the NAB show was compatible with AM mono analog transmission I believe that it will prove to be incompatible with CQUAM analog stereo. Selection of a stereo standard that ignores the NAB touted imminent possibility of digital stereo technology defies logic. I believe that it is necessary to wait just a little bit longer until the digital in band potential is better defined. We must compare the merits of ALL systems both digital and analog before selecting a standard. To be fully valid such tests should be made by an independent agency such as the National Bureau of Standards to guarantee that the system chosen does not handicap broadcasters as we enter the next century. Final selection of a standard system for AM stereo must be made on the basis of technical excellence under real life conditions if indeed AM is suffering from a lack of quality with respect to FM. The CQUAM system is not without flaws although I must admit that it can sound good in some conditions. Comparative tests based on the NRSC standard receiver bandwidth response have not been done for the existing systems. Compatibility tests for analog stereo have not been done for any digital proposal to date. Forcing other systems off the air at this time will not be a significant benefit to the public and may forever prevent use of innovative technology. If a single standard must be selected and announced for public consumption regardless of merit then the other systems should be allowed to be used on a noninterfering basis. This would be no different than the secondary multiplex communications allowed under 73.127 so a ban of other systems would be necessary only for political purposes.

Respectfully,



Timothy C. Cutforth P.E.

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